

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • Stephen M. Mahood, Director

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

January 23, 1998

CERTIFIED MAIL – Z 289 840 784
RETURN RECEIPT REQUESTED

Mr. Thomas S. Sanicola
Environmental Engineer
Modine Manufacturing Company
1500 DeKoven Avenue
Racine, WI 53403

RE: Modine Manufacturing Company, Camdenton, Missouri
Comprehensive Groundwater Monitoring Evaluation Report

Dear Mr. Sanicola:

A Comprehensive Groundwater Monitoring Evaluation (CME) Report concerning the groundwater monitoring program at Modine Manufacturing Company (Modine) in Camdenton, Missouri, has been prepared by the Missouri Department of Natural Resources' (MDNR) Hazardous Waste Program (HWP). A copy of this report is enclosed.

The report evaluates several aspects of site groundwater monitoring, including:

1) The site-specific Sampling and Analysis Plan (SAP); 2) The well sampling procedures as observed during a split-sampling event; and 3) The physical integrity of the groundwater monitoring wells.

This letter serves as notice that groundwater monitoring deficiencies do exist at the Modine, Camdenton, Missouri, facility which must be addressed to comply with the requirements of 40 CFR Part 265 Subpart F. Topically, these deficiencies relate to: 1) execution of sampling procedures; 2) maintenance of groundwater monitoring wells; 3) adequacy of the groundwater monitoring well network to determine the rate and extent of groundwater contamination at the facility. Cited deficiencies are based on a field audit of Modine's groundwater sampling and measurement procedures; inspection of Modine's groundwater monitoring wells, comparison of Modine's and MDNR's split-sampling results; and comprehensive review of Modine's historical corrective action and voluntary field investigation reports.



R00065041
RCRA Records Center

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A summary of noted CME deficiencies is presented in Section VI, "CONCLUSIONS," beginning on page 39 of the CME Report. Please submit to the HWP's Groundwater Unit, in the Permits Section, within 30 days of receipt of this letter, a response and/or a schedule of responses to the groundwater monitoring program deficiencies summarized in the CME report.

If you have any questions, please do not hesitate to contact Ms. Chris Kump, of my staff, at (573) 751-3553.

Sincerely,

HAZARDOUS WASTE PROGRAM

A handwritten signature in black ink, appearing to read "R. Bruce Stuart", with a stylized flourish at the end.

R. Bruce Stuart, P.E., R.G.
Chief, Groundwater Unit
Permits Section

RBS:ckb

Enclosure

c: Mr. William A. Spratlin, U.S. EPA Region VII
MDNR, Jefferson City Regional Office